

# EXHIBIT 1

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**From:** Mike Rothman [mailto:[mike@mikerothman.com](mailto:mike@mikerothman.com)]  
**Sent:** Thursday, July 22, 2010 5:43 PM  
**To:** Saunders, Sanford (Shld-DC-LT)  
**Cc:** [shr@ringlaw.us](mailto:shr@ringlaw.us); Burlacu, Nicoleta (Assoc-DC-LT)  
**Subject:** Re: WAUSA -- William Wagner Subpoena

Sandy,

You previously stated that you would not consent to extend a deadline that has already passed. Well, this one has not, yet you still refused. It is unreasonable and unhelpful. Moreover, I would hope in the future that you would please dispense with the inflammatory ad hominem attacks. Please lets try to keep this as professional as possible.

Best,

Mike

Law Office of Michael S. Rothman  
401 East Jefferson Street, #201  
Rockville, Maryland 20850  
phone: 301.251.9660  
fax: 301.251.9610  
email: [mike@mikerothman.com](mailto:mike@mikerothman.com)  
web: [www.mikerothman.com](http://www.mikerothman.com)

On Jul 22, 2010, at 5:01 PM, [saunderss@gtlaw.com](mailto:saunderss@gtlaw.com) wrote:

Mr. Rothman:

There you go again misstating the facts. We have granted BSI numerous extensions in the past and will continue to do so under normal circumstances. However, in this instance, as explained, we will not agree to extend a deadline which was previously cited by BSI as a basis not to cooperate with WAUSA on the issue of expedited discovery in support of WAUSA's Motion to Dismiss for Fraud on the Court filed in the Maryland action. Thus, it is inaccurate to refer to our declination as a "recent policy." Moreover, we regret your refusal to consider the request to file the Surreply on

the merits, but rather to reject the request because you did not get your way in your request for an extension in the Maryland matter.

Notwithstanding your subsequent discussion with Mr. Ring, he must be distracted. When we spoke, he went into detail regarding his filing deadlines and the absence of time to address WAUSA's discovery on an expedited basis. I even mentioned that we would shift our request from production this Friday to next Monday in order to accommodate his work load. He declined. Mr. Ring's comments were similar to the position BSI has taken in the Maryland litigation where it opposed expedited discovery and asserted "Plaintiff's opposition to the motion [to dismiss] is due Friday, July 23, 2010, the original due date. Plaintiff should be allowed a fair opportunity to state its position in normal course."

Best,

Sandy Saunders

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**From:** Mike Rothman [<mailto:mike@mikerothman.com>]  
**Sent:** Thursday, July 22, 2010 2:39 PM  
**To:** Saunders, Sanford (Shld-DC-LT)  
**Cc:** Ring Steve  
**Subject:** Re: WAUSA -- William Wagner Subpoena

Mr. Saunders :

Pursuant to your recent policy of extending no courtesy in such matters, we respectfully oppose your request. If you desire to take a more reasonable position in the future regarding these matters, we would be happy to discuss it.

Best,

Mike Rothman

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On Jul 22, 2010, at 1:07 PM, <[saunderss@gtlaw.com](mailto:saunderss@gtlaw.com)> <[saunderss@gtlaw.com](mailto:saunderss@gtlaw.com)> wrote:

Counsel:

Please advise by COB, Thursday, July 22 if BSI consents to World Avenue USA, LLC filing a Surreply to William Wagner's Reply in Support of his Renewed Motion for Sanctions in the District Court for the District of Columbia to address Mr. Wagner's misrepresentations of facts and law.

Thank you,

Sandy

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